

Ashley M. Simonsen (Bar No. 275203)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, California 90067  
Telephone: (424) 332-4800  
Facsimile: (424) 332-4749  
Email: asimonsen@cov.com

*Attorney for Defendants Meta Platforms, Inc.  
f/k/a Facebook, Inc.; Facebook Holdings, LLC;  
Facebook Operations, LLC; Meta Payments Inc.  
f/k/a Facebook Payments Inc.; Meta Platforms  
Technologies, LLC f/k/a Facebook Technologies,  
LLC; Instagram, LLC; and Siculus LLC f/k/a  
Siculus, Inc.*

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates To:

*ALL ACTIONS*

MDL No. 3047

Case No.: 4:22-md-03047-YGR

**DECLARATION OF ASHLEY M.  
SIMONSEN IN SUPPORT OF  
DEFENDANTS' MOTION TO EXCLUDE  
GENERAL CAUSATION TESTIMONY OF  
PLAINTIFFS' EXPERTS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Date: January 26, 2026  
Time: 8:00 AM  
Place: Courtroom 1, 4th Floor

**DECLARATION OF ASHLEY M. SIMONSEN**

I, Ashley Simonsen, declare as follows:

1. I am a partner with the law firm Covington & Burling LLP, counsel of record for Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.; Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.; Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc. I have personal knowledge of the following facts, and, if called as a witness, I could and would testify competently thereto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of National Academies of Sciences, Engineering, & Medicine, *Social Media and Adolescent Health* (2024).

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Ruling Document on Defendants' *Sargon* Motions, *Social Media Cases*, JCCP 5255 (Cal. Super Ct. Sept. 22, 2025).

4. Attached hereto as **Exhibit 3** is a true and correct copy of Am. Psych. Ass'n, *From Planning to Publication: Developing DSM-5-TR* (2022).

5. Attached hereto as **Exhibit 4** is a true and correct copy of Tayana Panova & Xavier Carbonell, Behavioral Addictions, Ch. 3: *Social Media Addiction* 75 (Springer 2022).

6. Attached hereto as **Exhibit 5** is a true and correct copy of Am. Acad. Pediatrics, *Problematic Technology Use* (last updated Oct. 17, 2023).

7. Attached hereto as **Exhibit 6** is a true and correct copy of the May 16, 2025 MDL Expert Report of Dimitri Christakis.

8. Attached hereto as **Exhibit 7** is a true and correct copy of U.S. Surgeon Gen., *Social Media and Youth Mental Health Advisory* at 4 (2023), <https://tinyurl.com/s98tfsfe>.

9. Attached hereto as **Exhibit 8** is a true and correct copy of Noah Kreski et al., *Social Media Use and Depressive Symptoms Among United States Adolescents*, 68 J. Adolescent Health 572 (2021).

10. Attached hereto as **Exhibit 9** is a true and correct copy of Amy Orben, *Teenagers, Screens, and Social Media: A Narrative Review of Reviews and Key Studies*, 55 Soc. Psychiatry & Psychiatric Epidemiology (2020).

11. Attached hereto as **Exhibit 10** is a true and correct copy of Candice L. Odgers & Michaeline R. Jensen, Annual Research Review: Adolescent Mental Health in the Digital Age: Facts, Fears, and Future Directions, 61 J. Child Psych. & Psychiatry (2020).

12. Attached hereto as **Exhibit 11** is a true and correct copy of ECF No. 494, Plaintiffs' Second Am. Master Compl., *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047 (N.D. Cal. Dec. 15, 2023).

13. Attached hereto as **Exhibit 12** is a true and correct copy of the September 11, 2025 MDL Deposition of Dimitri Christakis.

14. Attached hereto as **Exhibit 13** is a true and correct copy of Exhibit 15 to the June 25-26, 2025 Deposition of Dimitri Christakis—Dimitri Christakis, Lauren Hale, *Toward Defining Problematic Media Usage Patterns in Adolescents*, JAMA, 2025; 333 (23): 2045–2046, doi:10.1001/jama.2025.6113.

15. Attached hereto as **Exhibit 14** is a true and correct copy of Exhibit 35 to the June 25-26, 2025 Deposition of Dimitri Christakis (Dimitri Christakis, The Challenges of Defining and Studying "Digital Addiction" in Children, JAMA, 2019 Jun 18; 321 (23): 2277-2278, doi: 10.1001/jama.2019.4690.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the June 25-26, 2025 JCCP Deposition Transcript of Dimitri Christakis.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Exhibit 21 to the June 25-26, 2025 Deposition of Dimitri Christakis—a podcast titled The Leading Voices in Food, E269: Children, screen time and wellbeing – many reasons for concern, April 9, 2025, <https://wfpc.sanford.duke.edu/podcasts/children-screentime-and-wellbeing-many-reasons-for-concern/>.

18. Attached hereto as **Exhibit 17** is a true and correct copy of the July 30, 2025 Expert Rebuttal Report of Dimitri Christakis.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the Expert Report of Drew P. Cingel Ph.D.

20. Attached hereto as **Exhibit 19** is a true and correct copy of the July 9, 2025 Deposition Transcript of Drew Cingel.

21. Attached hereto as **Exhibit 20** is a true and correct copy of Min Jung Kim, Drew Cingel, and Yun Jung Choi, *Korean Children's YouTube Use and Social Skills: A Linkage Analysis with Negative Interactions in Favorite YouTube Content*, Media Psych. (Apr. 22, 2025).

22. Attached hereto as **Exhibit 21** is a true and correct copy of Sandro Galea et al., *Social Media and Adolescent Health*, NAS (2024).

23. Attached hereto as **Exhibit 22** is a true and correct copy of the July 9, 2025 Expert Report of Douglas Tucker, M.D.

24. Attached hereto as **Exhibit 23** is a true and correct copy of the JCCP Deposition Transcript of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated June 4-5, 2025

25. Attached hereto as **Exhibit 24** is a true and correct copy of the July 30, 2025 Amended Expert Report of Gary Goldfield.

26. Attached hereto as **Exhibit 25** is a true and correct copy of the transcript of the deposition of Gary Goldfield taken on July 10-11, 2025.

27. Attached hereto as **Exhibit 26** is a true and correct copy of the transcript of the deposition of Gary Goldfield taken on September 10, 2025.

28. Attached hereto as **Exhibit 27** is a true and correct copy of the errata sheet of the deposition of Gary Goldfield taken on July 11, 2025.

29. Attached hereto as **Exhibit 28** is a true and correct copy of an article authored by Metin Kuş, *A Meta-Analysis of the Impact of Technology Related Factors on Students' Academic Performance*, Frontiers in Psychology (Feb. 21, 2025), which was downloaded on September 28, 2025.

30. Attached hereto as **Exhibit 29** is a true and correct copy of an article authored by Nader Salari et al., *The Impact of Social Networking Addiction on the Academic Achievement of University Students Globally: A Meta-Analysis*, Public Health in Practice, Vol. 9, pp. 1–8 (2025), which was downloaded on September 28, 2025.

31. Attached hereto as **Exhibit 30** is a true and correct copy of the May 16, 2025 Expert Report of Anna Lembke.

32. Attached hereto as **Exhibit 31** is a true and correct copy of the June 18, 2025 Deposition Transcript of Anna Lembke.

33. Attached hereto as **Exhibit 32** is a true and correct copy of the July 30, 2025 Expert Rebuttal Report of Anna Lembke.

34. Attached hereto as **Exhibit 33** is a true and correct copy of the August 27, 2025 Deposition Transcript of Anna Lembke.

35. Attached hereto as **Exhibit 34** is a true and correct copy of the MDL Amended Expert Report of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated May 16, 2025.

36. Attached hereto as **Exhibit 35** is a true and correct copy of the JCCP Expert Report of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated April 18, 2025.

37. Attached hereto as **Exhibit 36** is a true and correct copy of the article: Bernadette Am Cullen, *et al.*, *Social network, recovery attitudes and internal stigma among those with serious mental illness*, International Journal of Social Psychiatry (2017).

38. Attached hereto as **Exhibit 37** is a true and correct copy of the article: Ramin Mojtabai, M.D., Ph.D., *Americans' Attitudes Toward mental Health Treatment Seeking 1990-2003*, Psychiatric Services (2007).

39. Attached hereto as **Exhibit 38** is a true and correct copy of Ramin Mojtabai, *Problematic social media use and psychological symptoms in adolescents*, Social Psychiatry and Psychiatric Epidemiology (2024).

40. Attached hereto as **Exhibit 39** is a true and correct copy of Exhibit 10, Federal Judicial Center, Federal Reference Manual on Scientific Evidence 218 (3d ed. 2011) at 560–61, to the JCCP deposition of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated June 4, 2025.

41. Attached hereto as **Exhibit 40** is a true and correct copy of Exhibit 9, a collection of quotations from 26 cross-sectional studies cited by Dr. Mojtabai, to the JCCP deposition of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated June 4, 2025.

42. Attached hereto as **Exhibit 41** is a true and correct copy of the MDL deposition transcript of Dr. Ramin Mojtabai, M.D., Ph.D., MPH, dated August 12, 2025.

43. Attached hereto as **Exhibit 42** is a true and correct copy of the expert report of Dr. Stuart Murray, MSc., DClinPsych, Ph.D., dated May 16, 2025.

1           44. Attached hereto as **Exhibit 43** is a true and correct copy of the JCCP deposition transcript  
2 of Dr. Stuart Murray MSc., DClinPsych, Ph.D., dated June 19, 2025.

3           45. Attached hereto as **Exhibit 44** is a true and correct copy of the MDL deposition transcript  
4 of Dr. Stuart Murray MSc., DClinPsych, Ph.D., dated August 25, 2025.

5           46. Attached hereto as **Exhibit 45** is a true and correct copy of Exhibit 12, article: Sean  
6 Griffiths, et al. (2024). *Does TikTok contribute to eating disorders? A comparison of the TikTok*  
7 *algorithms belonging to individuals with eating disorders versus healthy controls*, Body Image, 51 (2024)  
8 101807, to the MDL deposition of Dr. Stuart Murray MSc., DClinPsych, Ph.D., dated August 25, 2025.

9           47. Attached hereto as **Exhibit 46** is a true and correct copy of Exhibit 27, article: Trevor  
10 Steward, et al. (2024). *Distinct functional connectivity phenotypes in preadolescent children with binge*  
11 *eating disorder by BMI status*, Obesity, 32. 2802–2806, to the JCCP deposition of Dr. Stuart Murray  
12 MSc., DClinPsych, Ph.D., dated June 19, 2025.

13           48. Attached hereto as **Exhibit 47** is a true and correct copy of Exhibit 24, article: Lonergan  
14 et al., (2024) *Me, My Selfie, and I: The Impact of Editing and Posting Selfies on Male and Female Body*  
15 *Image*, Body Image, 28, 39-43 to the JCCP deposition of Dr. Stuart Murray MSc., DClinPsych, Ph.D.,  
16 dated June 19, 2025.

17           49. Attached hereto as **Exhibit 48** is a true and correct copy of Exhibit 26, article: Nagata et  
18 al., (2021) *Sociodemographic Correlates of Contemporary Screen Time Use among 9- and 10-Year-Old*  
19 *Children*, J. of Pediatrics, S0022-3476(21)00862-3) to the JCCP deposition of Dr. Stuart Murray MSc.,  
20 DClinPsych, Ph.D., dated June 19, 2025.

21           50. Attached hereto as **Exhibit 49** is a true and correct copy of Exhibit 23, article: Xinyi Shi,  
22 et al. (2024). *Concurrent and prospective associations of social media usage with binge eating symptoms*  
23 *in early adolescence*, Obesity, 33. 346–355, to the JCCP deposition of Dr. Stuart Murray MSc.,  
24 DClinPsych, Ph.D., dated June 19, 2025.

25           51. Attached hereto as **Exhibit 50** is a true and correct copy of the expert rebuttal report of  
26 Dr. Stuart Murray, MSc., DClinPsych, Ph.D., dated July 30, 2025.

27           52. Attached hereto as **Exhibit 51** is a true and correct copy of Exhibit 6, article: Cynthis  
28 Feltner, et al. (2022). *Screening for Eating Disorders in Adolescents and Adults Evidence Report and*

1 Systematic Review for the US preventative Services Task Force, Journal of American Medical  
 2 Association, 327(11): 1068–1082, to the MDL deposition of Dr. Stuart Murray MSc., DClinPsych, Ph.D.,  
 3 dated August 25, 2025.

4 53. Attached hereto as **Exhibit 52** is a true and correct copy of Exhibit 15, article: Christopher  
 5 J. Ferguson. (2024). *Do Social Media Experiments Prove a Link With Mental Health: A Methodological*  
 6 *and Meta-Analytic Review*. Psychology of Popular Media. 14. 201–206, to the MDL deposition of Dr.  
 7 Stuart Murray MSc., DClinPsych, Ph.D., dated August 25, 2025.

8 54. Attached hereto as **Exhibit 53** is a true and correct copy of Exhibit 16, article: Christopher  
 9 J. Ferguson, et al. (2021). Like This Meta-Analysis: Screen Media and Mental Health. Professional  
 10 Psychology: Research and Practice. 53. 205–214, to the MDL deposition of Dr. Stuart Murray MSc.,  
 11 DClinPsych, Ph.D., dated August 25, 2025.

12 55. Attached hereto as **Exhibit 54** is a true and correct copy of Exhibit 17, article: Elizabeth  
 13 J. Ivie, et al. (2021). *A Meta-analysis of the association between adolescent social media use and*  
 14 *depressive symptoms*, Journal of Affective Disorders, 275 (2020) 165–174, to the MDL deposition of Dr.  
 15 Stuart Murray MSc., DClinPsych, Ph.D., dated August 25, 2025.

16 56. Attached hereto as **Exhibit 55** is a true and correct copy of Exhibit 18, article: Amy Orben,  
 17 (2020). *Teenagers, screens and social media: a narrative review of reviews and key studies*, Social  
 18 Psychiatry and Psychiatric Epidemiology, 55:407–414, to the MDL deposition of Dr. Stuart Murray  
 19 MSc., DClinPsych, Ph.D., dated August 25, 2025.

20 57. Attached hereto as **Exhibit 56** is a true and correct copy of the May 16, 2025 Expert  
 21 Report of Eva Telzer.

22 58. Attached hereto as **Exhibit 57** is a true and correct copy of the June 12-13, 2025 JCCP  
 23 Deposition Transcript of Eva Telzer.

24 59. Attached hereto as **Exhibit 58** is a true and correct copy of the MDL Deposition Transcript  
 25 of Eva Telzer.

26 60. Attached hereto as **Exhibit 59** is a true and correct copy of Alan Hu Foundation, Lecture  
 27 Series: *Technology, Social Media, and Adolescent Mental Health*, YOUTUBE (June 12, 2023),  
 28 <https://tinyurl.com/4x8petxs>.



61. Attached hereto as **Exhibit 60** is a true and correct copy of Healthy Heels, *Digital Minds: Brain Development in the Age of Technology*, YOUTUBE (Feb. 18, 2025), <https://tinyurl.com/2k3n4334>.

62. Attached hereto as **Exhibit 61** is a true and correct copy of Kaitlyn Burnell et al., *U.S. Adolescents' Daily Social Media Use and Well-Being: Exploring the Role of Addiction-Like Social Media Use*, 19 J. CHILD. & MEDIA 194 (2025).

63. Attached hereto as **Exhibit 62** is a true and correct copy of *On the Record: Social Media's Impact on Children*, WRAL NEWS (May 28, 2023), <https://tinyurl.com/4mzauscm>.

64. Attached hereto as **Exhibit 63** is a true and correct copy of Austin Bradford Hill, *The Environment and Disease: Association or Causation?*, 58 PROC. ROYAL SOC'Y MED. 295 (1965).

65. Attached hereto as **Exhibit 64** is a true and correct copy of Am. Psychiatric Ass'n, *Diagnostic and Statistical Manual of Mental Disorders: DSM-5-TR* (5th ed. 2022).

66. Attached hereto as **Exhibit 65** is a true and correct copy of the July 30, 2025 Expert Rebuttal Report of Eva Telzer.

67. Attached hereto as **Exhibit 66** is a true and correct copy of Exhibit 5 of the JCCP Deposition of Eva Telzer.

68. Attached hereto as **Exhibit 67** is a true and correct copy of Exhibit 6 of the JCCP Deposition of Eva Telzer.

69. Attached hereto as **Exhibit 68** is a true and correct copy of Exhibit 7 of the JCCP Deposition of Eva Telzer.

70. Attached hereto as **Exhibit 69** is a true and correct copy of Exhibit 8 of the JCCP Deposition of Eva Telzer.

71. Attached hereto as **Exhibit 70** is a true and correct copy of a May 13, 2025 Email from Rachel Lanier to Rose Ehler re: Dr. Telzer - Production Deficiencies, as provided to my firm by counsel for Snapchat.

72. Attached hereto as **Exhibit 71** is a true and correct copy of the MDL PI/SD expert report of Dr. Jean Twenge, Ph.D., dated May 16, 2025.

73. Attached hereto as **Exhibit 72** is a true and correct copy of the MDL AG expert report of Dr. Jean Twenge, Ph.D., dated May 16, 2025.



74. Attached hereto as **Exhibit 73** is a true and correct copy of the MDL deposition transcript of Dr. Jean Twenge, Ph.D., dated September 17-18, 2025.

75. Attached hereto as **Exhibit 74** is a true and correct copy of the JCCP deposition transcript of Dr. Jean Twenge, Ph.D., dated June 26, 2025.

76. Attached hereto as **Exhibit 75** is a true and correct copy of the Substack post: Anna Lembke, Applying the Bradford Hill Criteria to Social Media Use and Adolescent Mental Health, After Babel Substack (December 17, 2024).

77. Attached hereto as **Exhibit 76** is a true and correct copy of the article: Twenge, J.M. & Hamilton, J.L. (2022). *Linear correlation is insufficient as the sole measure of associations: The case of technology use and mental health*, Acta Psychology, 229, e103696.

78. Attached hereto as **Exhibit 77** is a true and correct copy of the article: Twenge, J.M. & Farley, E. (2020). *Not all screen time is created equal: association with mental health vary by activity and gender*, Social Psychiatry and Psychiatric Epidemiology, 56, 207–217.

79. Attached hereto as **Exhibit 78** is a true and correct copy of the Rebuttal Expert Report of Dr. Jean Twenge, Ph.D., dated July 30, 2025.

80. Attached hereto as **Exhibit 79** is a true and correct copy of the August 12-13, 2025 Deposition Transcript of Dr. Sharon A. Hoover, Ph.D.

81. Attached hereto as **Exhibit 80** is a true and correct copy of the May 16, 2025 Expert Report of Dr. Sharon A. Hoover, Ph.D.

82. Attached hereto as **Exhibit 81** is a true and correct copy of the August 1, 2025 Rebuttal Report of Dr. Sharon A. Hoover, Ph.D. for Tucson Unified School District.

83. Attached hereto as **Exhibit 82** is a true and correct copy of a report by the Pew Research Center titled *Teens, Social Media and Mental Health*.

84. Attached hereto as **Exhibit 83** is a true and correct copy of an article by Jamil et al. titled *Impact of Social Media on Academic Performance*.

85. Attached hereto as **Exhibit 84** is a true and correct copy of an article by Tørmøen et al. titled *A Nationwide Study on Time Spent on Social Media and Self-Harm Among Adolescents*.

1           86. Attached hereto as **Exhibit 85** is a true and correct copy of an article by Chao et al. titled  
2 *TikTok Use and Psychosocial Factors Among Adolescents: Comparisons of Non-Users, Moderate Users,*  
3 *and Addictive Users.*

4           87. Attached hereto as **Exhibit 86** is a true and correct copy of an article by Dane et al. titled  
5 *The Social Media Diet: A Scoping Review to Investigate the Association Between Social Media, Body*  
6 *Image and Eating Disorders Amongst Young People.*

7           88. Attached hereto as **Exhibit 87** is a true and correct copy of the Plaintiffs' May 16, 2025  
8 Disclosure Letter Regarding Arturo Béjar.

9           89. Attached hereto as **Exhibit 88** is a true and correct copy of the JCCP Deposition Transcript  
10 of Arturo Béjar.

11           90. Attached hereto as **Exhibit 89** is a true and correct copy of the MDL Deposition Transcript  
12 of Arturo Béjar.

13           91. Attached hereto as **Exhibit 90** is a true and correct copy of the MDL Deposition Transcript  
14 of Lotte Rubaek.

15           92. Attached hereto as **Exhibit 91** is a true and correct copy of the JCCP Deposition Transcript  
16 of Lotte Rubaek.

17           93. Attached hereto as **Exhibit 92** is a true and correct copy of the July 30, 2025 Rebuttal  
18 Trial Report of Lauren Hale.

19           94. Attached hereto as **Exhibit 93** is a true and correct copy of the Deposition Transcript of  
20 Lauren Hale.

21           95. Attached hereto as **Exhibit 94** is a true and correct copy of Hartstein et al., *The impact of*  
22 *screen use on sleep health across the lifespan: A National Sleep Foundation consensus statement*, Sleep  
23 Health: J. Nat'l Sleep Found. (May 2024).

24           96. Attached hereto as **Exhibit 95** is a true and correct copy of Capraro et al., *A consensus*  
25 *statement on potential negative impacts of smartphone and social media use on adolescent mental health*,  
26 PsyArXiv preprint (May 16, 2025).

27           97. Attached hereto as **Exhibit 96** is a true and correct copy of the May 16, 2025 Expert  
28 Report of Bradley Zicherman.

1           98. Attached hereto as **Exhibit 97** is a true and correct copy of the July 30, 2025 Expert  
2 Rebuttal Report of Bradley Zicherman.

3           99. Attached hereto as **Exhibit 98** is a true and correct copy of the Deposition Transcript of  
4 Bradley Zicherman.

5           I declare under penalty of perjury under the law of the State of California that the foregoing is true  
6 and correct. Executed on September 30, 2025, in Los Angeles, California.

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9 DATED: September 30, 2025

Respectfully submitted,

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11 By: /s/ Ashley M. Simonsen  
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